

Burnside, Samantha J.

From: Sullivan, Cary D. <carysullivan@jonesday.com>
Sent: Tuesday, October 22, 2024 9:31 AM
To: Aldrich, Nika F.
Cc: Brian R. Talcott (<btalcott@dunncarney.com>); Contreras, Angeline; _Cronometer Counsel
Subject: RE: Trustwell v Cronometer [IMAN-PDX.FID4648279]

Confirmed, thanks.

Cary D. Sullivan
 Partner
JONES DAY® - One Firm WorldwideSM
 3161 Michelson Drive, Suite 800
 Irvine, CA 92612
 Office +1.949.553.7513

From: Aldrich, Nika F. <NAldrich@SCHWABE.com>
Sent: Tuesday, October 22, 2024 8:35 AM
To: Sullivan, Cary D. <carysullivan@jonesday.com>
Cc: Brian R. Talcott (<btalcott@dunncarney.com>); Contreras, Angeline
 <acontreras@jonesday.com>; _Cronometer Counsel <CronometerCounsel@SCHWABE.com>
Subject: RE: Trustwell v Cronometer [IMAN-PDX.FID4648279]

Cary,

I am attaching the waiver of service of summons that was sent to Schwabe's Portland office on September 19, 2024. A physical copy is going in the mail to you today. Pursuant to our agreement below, the response deadline is now December 18, 2024. Please confirm.

Nika Aldrich

Shareholder
 D: (503) 796-2494
 C: (206) 778-9678
naldrich@schwabe.com

Schwabe

From: Sullivan, Cary D. <carysullivan@jonesday.com>
Sent: Monday, October 21, 2024 5:02 PM
To: Aldrich, Nika F. <NAldrich@SCHWABE.com>
Cc: Brian R. Talcott (<btalcott@dunncarney.com>); Contreras, Angeline
 <acontreras@jonesday.com>
Subject: RE: Trustwell v Cronometer [IMAN-PDX.FID4648279]

Nika,

It's unfortunate that it has taken your client more than a month to agree to something that should be a formality.

If Cronometer is serious this time, please send us tomorrow the executed waiver of service that we originally served on you, dated September 19. That would make Cronometer's deadline to respond to the complaint December 18 (90 days after September 19).

Thanks,

Cary

Cary D. Sullivan

Partner

JONES DAY® - One Firm Worldwide™

3161 Michelson Drive, Suite 800

Irvine, CA 92612

Office +1.949.553.7513

From: Aldrich, Nika F. <NAldrich@SCHWABE.com>

Sent: Monday, October 21, 2024 10:41 AM

To: Sullivan, Cary D. <carysullivan@jonesday.com>

Cc: Brian R. Talcott (btalcott@dunncarney.com) <btalcott@dunncarney.com>; Contreras, Angeline

<acontreras@jonesday.com>

Subject: RE: Trustwell v Cronometer [IMAN-PDX.FID4648279]

Cary,

My client is considering signing the waiver form and returning it. My client would potentially agree to accept the waiver request form sent to me if you will you agree that their return of the waiver shall be treated as though it was sent "to the defendant outside any judicial district of the United States" pursuant to Rule 4(d)(3), such that a response is not due until "90 days after [the waiver request] was sent." In other words, they would waive service and have a response deadline in mid-December.

Please advise.

Thank you,

Nika Aldrich

Shareholder

D: (503) 796-2494

C: (206) 778-9678

naaldrich@schwabe.com